

RECEIVED

FEB 24 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

Administration of the North )  
American Numbering Plan )  
\_\_\_\_\_ )

CC Docket No. 92-237  
Phase I

REPLY COMMENTS OF BELLSOUTH

William B. Barfield  
Thompson T. Rawls II

Suite 1800  
1155 Peachtree Street, N.E.  
Atlanta, Georgia 30367-6000  
(404) 249-2706

Attorneys for:

BELLSOUTH CORPORATION and  
BELLSOUTH TELECOMMUNICATIONS, INC.

DATE: February 24, 1993

No. of Copies rec'd  
UNABCODE

044

## TABLE OF CONTENTS

SUMMARY.....	i
INTRODUCTION.....	1
SPECIFIC PROPOSAL.....	2
A.    A New World Zone 1 Numbering Forum.....	2
B.    Division Of Responsibilities Between NANP Administrator And World Zone 1 Numbering Forum.....	6
C.    Initial Business Of World Zone 1 Numbering Forum.....	7
D.    Transition Of Industry Numbering Activities To New Forum.....	8
E.    The FCC Should Approve All NANP Code Assignment Guidelines Via Expedited Rulemaking Proceedings.....	9
CONCLUSION.....	11
Exhibit 1	
Exhibit 2	

## SUMMARY

In an effort to facilitate industry consensus and FCC action, BellSouth limits its reply comments to setting forth a detailed proposal for a new organizational framework for NANP administration.

At the heart of this proposal is the creation of a new World Zone 1 Numbering Forum. This Forum would serve as a single industry venue for addressing and resolving all significant numbering and NANP related issues. The Forum would be open to all industry segments and participants, and operate upon an industry consensus basis. The Forum would be responsible for recommending policy changes to the NANP. Particular issues would be worked through Forum subcommittees or working groups.

Once the new Forum has been established, appropriate numbering issues being worked at that time in other industry fora would be transferred to and be reconstituted as subcommittees or working groups of the World Zone 1 Numbering Forum. The Forum would, however, be free to enlist the assistance of other industry fora to resolve particular numbering issues.

As one of its first items of business, the World Zone 1 Numbering Forum would develop a plan for the orderly transfer of administration of the NANP from Bellcore to an independent entity that is not affiliated with any user of resources directly assigned by the NANP administrator.

Under BellSouth's proposal, the NANP administrator would be responsible for implementing policy changes recommended by the World Zone 1 Numbering Forum and approved by the FCC, and where appropriate, by other World Zone 1 government authorities. The NANP administrator would assign all NANP resources, including NPAs, SACs and NXXs within geographic NPAs, in accordance with industry and FCC approved assignment guidelines. The NANP administrator would also serve as the primary technical consultant on NANP issues. The NANP administrator would not determine policy nor have the authority to unilaterally change NANP assignment guidelines.

Consistent with the scope of its jurisdiction, the FCC should adopt as Commission policy (with appropriate modifications where justified) industry consensus recommendations on all significant numbering policy issues. This would include, for example, all NANP assignment guidelines. The FCC would participate as a non-voting member of the World Zone 1 Numbering Forum. The FCC would continue to serve as the ultimate venue for resolving disputes in the U.S. concerning NANP administration and numbering issues, including the resolution of those issues failing to receive consensus in the World Zone 1 Numbering Forum.

RECEIVED

FEB 24 1993

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Administration of the North ) CC Docket No. 92-237  
American Numbering Plan ) Phase I  
 )

REPLY COMMENTS OF BELL SOUTH

BellSouth Corporation and its telephone operating company, BellSouth Telecommunications, Inc. ("BellSouth"), hereby file reply comments on Phase I (Overall Administration of the NANP) of the Notice Of Inquiry (NOI) released by the Commission in the above-captioned docket on October 29, 1992.

INTRODUCTION

With few exceptions, the comments filed in this proceeding reflect broad based support for changing the organizational framework for administering the North American Numbering Plan (NANP). Although the comments do not indicate consensus on precisely how to accomplish this task, there is general agreement on the need for an administrative framework which better suits the increasingly competitive and pluralistic nature of the telecommunications industry.

The comments generally support the concept of creating a new advisory committee or forum to address numbering issues. Also, with the exception of some local exchange carriers, most commenters seem to favor the transfer of NANP

administration to an entity which is not affiliated with a user of the resources directly assigned by the NANP administrator. Despite these general areas of agreement, however, the various suggestions to change the NANP's administrative structure generally lack sufficient detail upon which to build industry consensus around any particular proposal.

In an effort to facilitate industry consensus on a new framework, BellSouth will limit these reply comments to setting forth a detailed proposal for a new organizational framework for NANP administration. By doing so, BellSouth hopes that these comments and the comments of others filed in this proceeding will provide the Commission with a sufficient record to initiate, in coordination with other World Zone 1 government authorities, a specific plan for modifying the overall administrative structure of the NANP.

#### SPECIFIC PROPOSAL

BellSouth urges the Commission to adopt and the industry to support an administrative framework for the NANP which includes the following:

##### A. A New World Zone 1 Numbering Forum

The Commission should adopt an overall structural framework for NANP administration similar to the one shown in the diagram attached hereto as Exhibit 1. The cornerstone of this framework is a new World Zone 1 Numbering Forum. This framework (Exhibit 1) differs in a

few important respects from the one most recently described by the NANP administrator in Appendix L to its Proposal on the Future of Numbering in World Zone 1.<sup>1</sup> A copy of that Appendix is attached hereto as Exhibit 2.

BellSouth believes that the World Zone 1 "Steering Committee" and U.S. Numbering "Steering Committee" proposed by the NANP administrator (Exhibit 2) should be collapsed into a single World Zone 1 Numbering "Forum". There are two basic reason for this difference in approach. One, BellSouth believes that the concept of an advisory council or steering committee falls short of what is needed. BellSouth favors the establishment of a single industry forum that actively works numbering issues through subcommittees or working groups. An important aspect of BellSouth's proposal is that the World Zone 1 Forum would be open to all industry segments and participants, and that it would rely upon the industry consensus process to support its actions and recommendations.<sup>2</sup> By contrast, an advisory council or steering committee suggests an organization composed of a necessarily limited number of select industry representatives who provide only high level guidance and

---

<sup>1</sup> See, North American Numbering Plan Administrator's Proposal on the Future of Numbering in World Zone 1, Second Edition, dated January 4, 1993, p. 57, Appendix L.

<sup>2</sup> A number of other commenters support the concept of establishing a single industry forum to address numbering issues. See, Comments of AT&T p. 4-5, MCI p. 16, Southwestern Bell p. 4-5, GTE p. 10, CTIA p. 3, PageNet p. 1 and McCaw p. 10.

recommendations. Two, requiring numbering issues to clear two separate forums or steering committees adds unnecessary administrative delay and inefficiencies that generally can be avoided by addressing those issues in a single forum. To the extent any numbering issues might have only U.S. implications, those issues can be addressed just as efficiently through the formation of a U.S. subcommittee within the World Zone 1 Numbering Forum.

The single World Zone 1 Numbering Forum proposed by BellSouth would serve as the primary industry venue for addressing and resolving all significant numbering and NANP related issues. This structure not only allows for the more efficient resolution of numbering issues, it also recognizes the fact that the resolution of most numbering issues directly affects other World Zone 1 nations. While the World Zone 1 Numbering Forum would have primary responsibility for developing industry consensus on numbering policy issues, the forum would be free to enlist the assistance of other industry fora, as needed, to resolve particular issues.

The World Zone 1 Numbering Forum would only recommend those changes to the NANP that receive industry consensus. Typically, such changes should also require FCC approval via an expedited rulemaking proceeding or a declaratory ruling as a condition to implementation in the U.S. Similar approval by other World Zone 1 government agencies or

representatives may be appropriate in their respective geographic areas. Numbering issues which do not receive industry consensus in the Forum would be referred directly to the FCC for resolution. It is expected that the FCC would attend meetings of the World Zone 1 Numbering Forum as a non-voting industry participant.<sup>3</sup>

In BellSouth's view, there will be far too many conflicting service priorities and competitive interests in tomorrow's telecommunications environment to operate the NANP solely on the basis of industry consensus. More direct participation by the Commission will be required than in the past to ensure industry cooperation in the efficient administration and operation of the NANP within the U.S. Policy issues in a rapidly evolving competitive telecommunications environment will increasingly not lend themselves to resolution solely through the consensus process. Since the FCC asserts that it maintains plenary jurisdiction over the NANP within the United States,<sup>4</sup> it is appropriate for the Commission to step forward and take a more active leadership role in NANP administration. This role would be filled by active participation in the World

---

<sup>3</sup> Since the FCC may periodically be called upon in formal rulemaking or complaint proceedings to review the propriety of recommendations and actions of the World Zone 1 Numbering Forum, it would not be appropriate for the Commission to vote on the Forum's recommendations as a participating member of the Forum.

<sup>4</sup> NOI at para. 6.

Zone 1 Numbering Forum and by conducting related expedited rulemaking proceedings.

B. Division Of Responsibilities Between NANP Administrator And World Zone 1 Numbering Forum

The FCC should formally designate the World Zone 1 Numbering Forum as the appropriate industry organization with initial responsibility for policy development on numbering issues. Any policy changes affecting the NANP within the U.S., however, would be subject to FCC approval. Under this new administrative framework, the continuing role of the NANP administrator would be limited to administering the NANP in accordance with guidelines recommended by the World Zone 1 Numbering Forum and approved by the FCC; and where applicable, approved by other World Zone 1 government agencies. In short, BellSouth agrees with the comments of those who advocate a split between NANP policy development and administration functions.<sup>5</sup> The NANP administrator would also continue to serve as the primary technical expert on U.S. numbering matters.

The NANP administrator would not be permitted to unilaterally change NANP guidelines, but would be allowed to exercise reasonable judgement within the boundaries of industry/FCC/foreign government approved guidelines to discharge its administrative responsibilities. Thus, by way of recent example, the NANP administrator would lack

---

<sup>5</sup> See, Comments of AT&T p. 6-7, CTIA p. 3-4, Telecator p. 34, PageNet p. 1, and MCI p.1.

authority to assign an interchangeable NPA (INPA) code to be used for international calls terminating in the U.S. on a particular carrier's network, unless the NANP assignment guidelines were specifically modified by the new Forum and the FCC to allow for such assignment. By contrast, the assignment of an INPA code to provide relief for an exhausting NPA would be within the administrative purview of the NANP administrator.

C. Initial Business Of World Zone 1 Numbering Forum

The FCC should move immediately to establish a single World Zone 1 Numbering Forum, as described above. As its first order of business, the Forum should address the following matters:

- (1) adoption of a charter, organizational structure and procedures for conducting business;
- (2) development of a plan for the orderly transfer of administration of the NANP from Bellcore to an independent entity that is not affiliated with any user of resources (i.e., NPAs, SACs and NXXs) directly assigned by the NANP administrator;<sup>6</sup>

---

<sup>6</sup> For reasons explained in its previously filed comments, BellSouth also recommends that the administration of all NXX (i.e., central office) code assignments within geographic area codes be transferred from the local exchange carriers currently performing those responsibilities to the new NANP administrator. See, Comments of BellSouth, filed December 28, 1992, p. 8-9. Also, the transfer plan could draw upon the current expertise of Bellcore to assist in the education of the new NANP administrator as advocated by some commenters. See, Comments of McCaw p. 16.

- (3) development of an industry plan for the equitable sharing of the costs of NANP administration, including administrative expenses associated with operating the World Zone 1 Numbering Forum and expenses associated with transferring NANP administration from Bellcore to a new entity; and
- (4) determine whether any additional changes in the current NANP administrative framework are needed to reassure the industry of Bellcore's impartiality between now and when administrative responsibilities are ultimately transferred to another entity.

D. Transition Of Industry Numbering Activities To New Forum

Work currently going on in other industry fora concerning numbering issues should continue without interruption. However, once the World Zone 1 Numbering Forum has been organized and its charter established, all appropriate numbering issues and existing work efforts conducted in other industry fora should be transferred to it for resolution.

As mentioned above, the World Zone 1 Numbering Forum would have the option of enlisting additional input on a particular issue from any other industry forum or organization (e.g., ICCF, TR 45, T1 Committee, NARUC etc.). Once the World Zone 1 Numbering Forum is established, however, all appropriate subcommittees and working groups

addressing numbering issues in other industry fora would be transferred to it. It is contemplated that the entire subcommittee or working group effort, not just the issue, would be transferred to and be reconstituted as part of the World Zone 1 Numbering Forum. Under this approach, existing industry work on numbering issues can continue without delay or disruption.<sup>7</sup> This procedure would also allow for a smooth transition of all numbering issues to a single numbering forum.

E. The FCC Should Approve All NANP Code Assignment Guidelines Via Expedited Rulemaking Proceedings.

There are several efforts currently underway that represent an attempt by the industry to reach consensus on uniform guidelines for assigning various NANP resources. The Central Office Code Guidelines Forum (COCGF) is working on the development of uniform guidelines for the assignment of central office (NXX) codes within geographic area codes. The NANP administrator is working with the industry on developing guidelines for the assignment of new interchangeable NPA codes.<sup>8</sup> The ICCF and the NANP administrator are addressing the use of a N00 code and

---

<sup>7</sup> By way of example, the industry recently completed the transfer of the ongoing work of the Central Office Code Guidelines Forum that had been conducted under the sponsorship of the NANP administrator and the FCC to the ICCF without causing any delay or disruption to that work effort. There is no reason why the ongoing numbering activities of other industry fora can not be similarly transferred without disruption or delay.

<sup>8</sup> NOI para. 13.

developing related assignment guidelines for personal communications services (PCS). As discussed in BellSouth's Phase II reply comments, the industry recently reached consensus under the auspices of the ICCF on assignment guidelines for four-digit FGB and FGD CIC codes.<sup>9</sup>

The FCC should formally adopt as Commission policy (with appropriate public interest modifications where justified) industry consensus recommendations on all significant numbering policy issues. This would include, for example, all of the above referenced assignment guidelines. A clear finding by the FCC that these guidelines shall be followed and are in the public interest would do much to eliminate the concerns of those who question the impartiality and fairness of the administrative actions of the NANP administrator and the local exchange carriers who currently administer central office (NXX) code assignments in geographic NPAs. The FCC should give the industry and those entities currently performing NANP administrative functions a clear set of guidelines and procedures upon which to base their decisions and planning. Additionally, where industry consensus on an important NANP policy issue is not reached within a specified timeframe, the FCC should, consistent with the scope of its

---

<sup>9</sup> See, BellSouth Reply Comments, Phase II, Exhibit 1.

jurisdiction, step in to resolve that issue via a declaratory ruling or rulemaking.<sup>10</sup>

CONCLUSION

For the above reasons, BellSouth urges the Commission to move quickly to create a new World Zone 1 Numbering Forum and to initiate the rulemakings and other actions described herein.

Respectfully submitted,

BELLSOUTH CORPORATION and  
BELLSOUTH TELECOMMUNICATIONS, INC.

By: Thompson Rawls  
William B. Barfield  
Thompson T. Rawls II

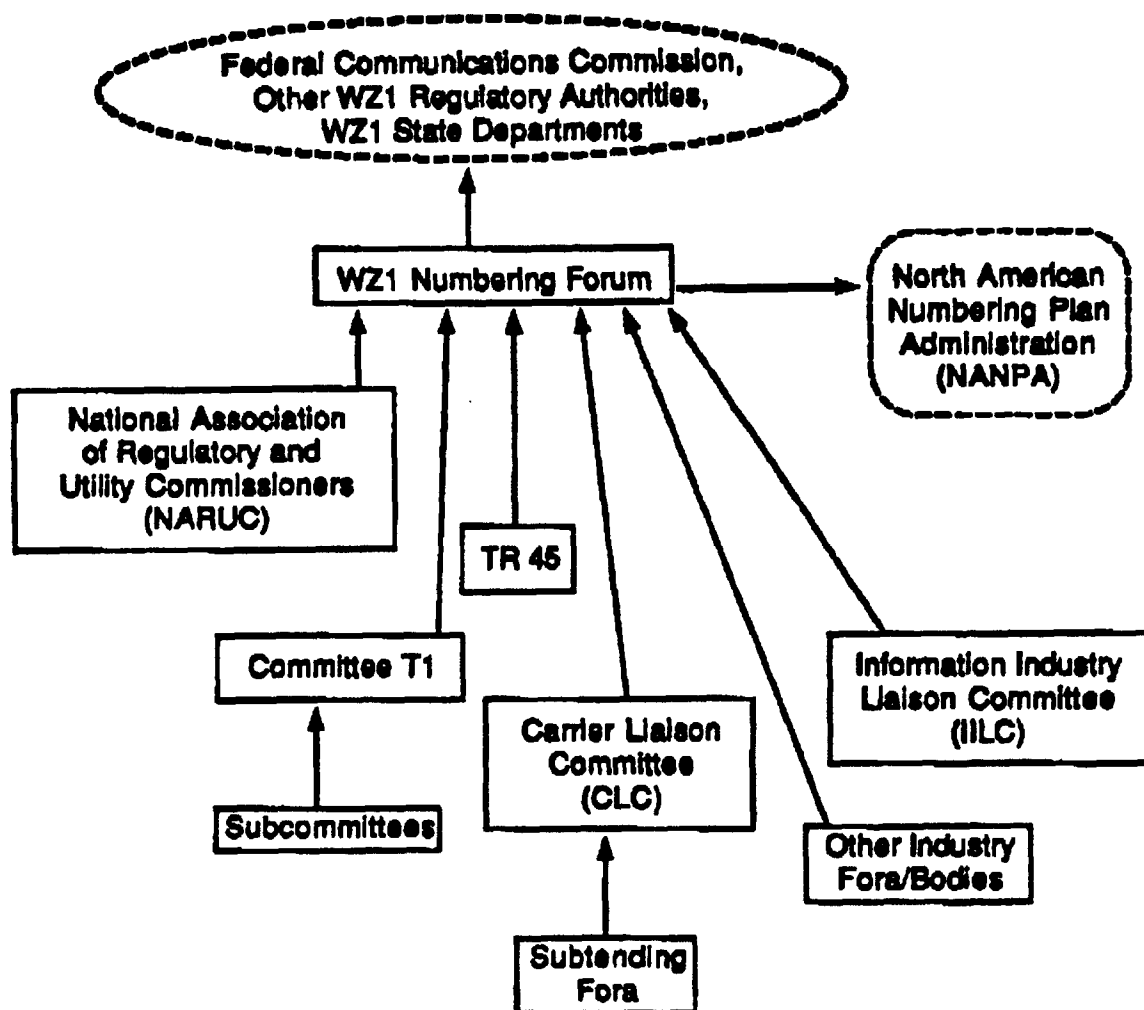
Their Attorneys

1155 Peachtree Street N.E.  
Suite 1800  
Atlanta, Georgia 30367-6000  
(404) 249-2706

February 24, 1993

---

<sup>10</sup> See, Comments of BellSouth Corporation, p. 11.



#### NANPA Responsibilities

- Implement policy
- Assign resources per approved guidelines
- Assign all NPAs, SACs and NDCs
- Technical consultant on NANP issues

#### WZ1 Numbering Forum Responsibilities

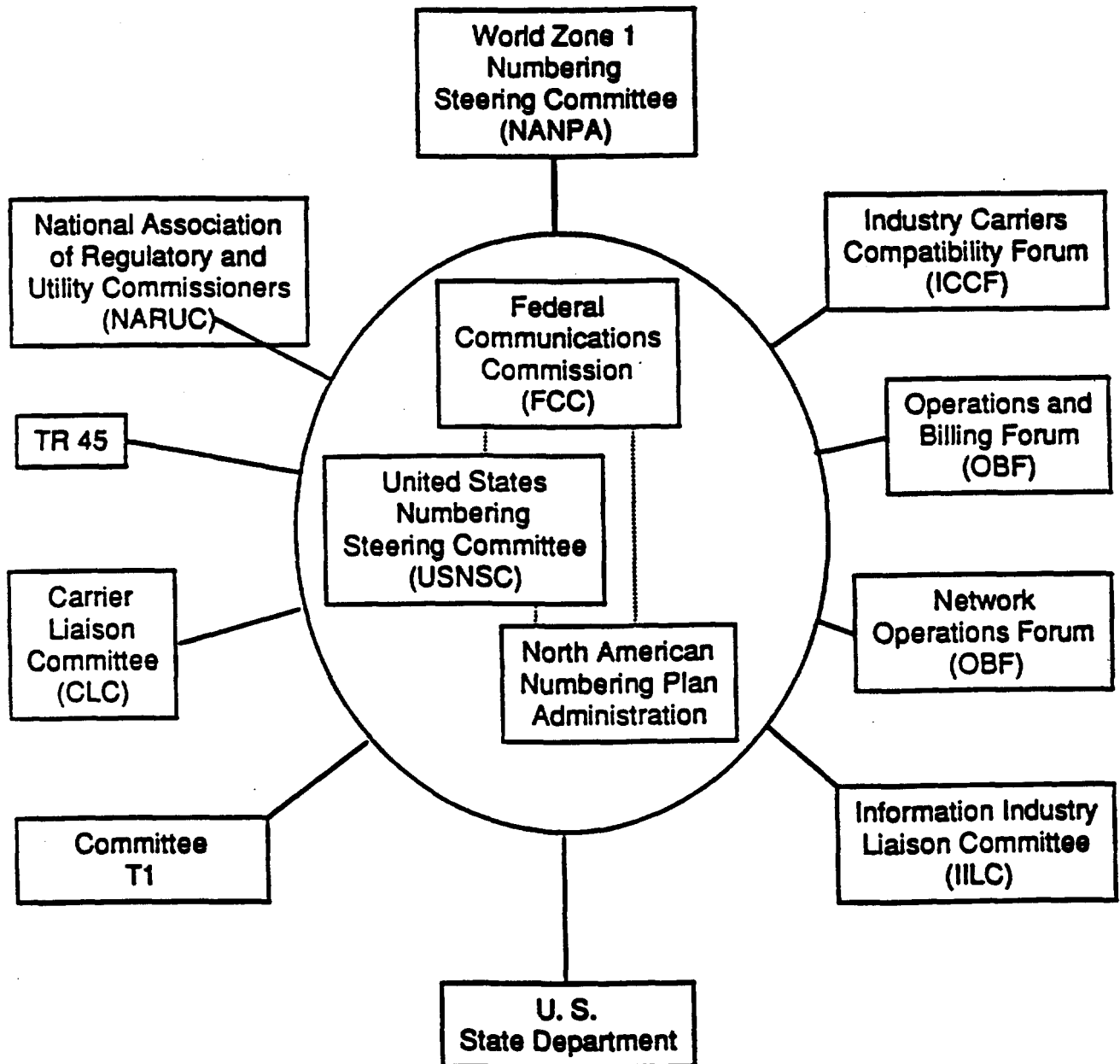
- Recommend policy
- Initial review of all numbering issues
- Recommendations requiring industry consensus
- Coordination with other industry fora/organizations

#### FCC/Other WZ1 Regulatory Authorities' Responsibilities

- Approve policy
- Approve NANP assignment guidelines
- Ultimate dispute resolution

Appendix L, concluded

USNSC Interworking



CERTIFICATE OF SERVICE

I hereby certify that I have this 24th day of February, 1993 serviced all parties to this action with a copy of the foregoing REPLY COMMENTS by placing a true and correct copy of same in the United States mail, postage prepaid, addressed to:

Gaye Fidelibus  
Gaye Fidelibus

**SERVICE LIST FOR CC DOCKET 92-237**

**NARUC**

Paul Rodgers  
Charles D. Gray  
James Bradford Ramsay  
1102 ICC Building  
P.O. Box 684  
Washington, DC 20044

**Florida Public Service Com.**  
William E. Wyrrough, Jr.  
Fletcher Building  
101 East Gaines Street  
Tallahassee, FL 32390-0850

**Rochester Telephone Corp.**  
Josephine S. Trubek  
General Counsel  
180 South Clinton Avenue  
Rochester, NY 14646

**Centel Corporation**  
A.A. Kurtze  
Executive Vice President  
8725 Higgins Road  
Chicago, Illinois 60631

**Centel Corporation**  
Theodore D. Frank  
Vonya B. McCann  
Arent Fox Kintner, et al  
1050 Connecticut Ave., NW  
Washington, DC 20036-5339

**North Pittsburgh Telephone**  
G. A. Gorman  
Executive Vice President  
4008 Gibsonia Road  
Gibsonia, PA 15044-9311

**Metropolitan Fiber Systems, Inc.**  
Andrew D. Lipman  
Russell M. Blau  
Swidler & Berlin  
3000 K Street, NW  
Washington, DC 20007

**National Telephone Cooperative Association**  
David Cosson  
L. Marie Guillory  
2626 Pennsylvania Ave., NW  
Washington, DC 20037

**ROGERS CANTEL, INC.**  
William A. Mason, Director  
Government & Intercarrier Rel.  
10 York Mills Road  
North York, Ontario M2P 2C9

**Unitel Communications, Inc.**  
Allan G. Duncan  
General Manager  
200 Wellington Street West  
Toronto, Ontario MSV 3C7

**Telocator**

R. Michael Senkowski  
Jeffrey S. Linder  
Aliza F. Katz  
Wiley, Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

**United Telecommunications,  
Inc.**

Jay C. Keithley  
Vice President  
1850 M Street, NW - 11th Flr.  
Washington, DC 20036

**Pacific Bell/Nevada Bell**

James P. Tuthill  
Nancy C. Woolf  
140 New Montgomery St.  
Room 1523  
San Francisco, CA 94105

**Pacific Bell/Nevada Bell**

Stanley J. Moore  
1275 Pennsylvania Ave., NW  
Washington, DC 20004

**Teleport Communications Group**

Alex J. Harris  
Manager, Regulatory Affairs  
1 Teleport Drive  
Staten Island, NY 10311-1011

**U.S. Telephone Association**

Martin C. McCue  
Vice President - Gen. Counsel  
900 19th St., NW - Suite 800  
Washington, DC 20006-2105

**Southwestern Bell**

James D. Ellis  
William J. Free  
Mark P. Royer  
One Bell Center, Room 3524  
St. Louis, MO 63101-2992

**McCaw Cellular Communications**

Marsha Olch  
Mark R. Hamilton  
R. Michael Senkowski  
5400 Carillon Point  
Kirkland, WA 98033

**Telecom Canada**

A. Richard Metzger, Jr.  
Roger V. Wells  
1737 H Street, NW  
Washington, DC 20006-3922

**NYNEX Telephone Companies**

Mary McDermott  
Campbell L. Ayling  
120 Bloomingdale Road  
White Plains, NY 10605

**Ameritech Operating Companies**  
Floyd S. Keene  
Larry A. Peck  
2000 W. Ameritech Center Drive  
Room 4H84  
Hoffman Estates, IL 60196-1025

**MCI Communications Corp.**  
Loretta J. Garcia  
1801 Pennsylvania Ave., NW  
Washington, DC 20006

**GTE Service Corporation**  
Daniel L. Bart  
Suite 1200  
1850 M Street, NW  
Washington, DC 20036

**Allnet Communication Services**  
Roy L. Morris  
Deputy General Counsel  
1990 M Street, NW - Ste. 500  
Washington, DC 20036

**U S. West Communications, Inc.**  
Lawrence E. Sarjeant  
James T. Hannon  
1020 19th St., NW - Ste. 700  
Washington, DC 20036

**AT&T**  
Francine J. Berry  
Mark C. Rosenblum  
Albert M. Lewis  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920-1002

**Bell Communications Research,  
Inc.**  
Michael S. Slomin  
290 West Mt. Pleasant Ave.  
Livingston, NJ 07039

**Public Service Commission**  
District of Columbia  
Daryl L. Avery  
Peter G. Wolfe  
450 Fifth Street, NW  
Washington, DC 20001

**Bell Atlantic Telephone Cos.**  
John M. Goodman  
Charles H. Kennedy  
1710 H Street, NW - 8th Floor  
Washington, DC 20006

**Competitive Telecommunications  
Association**  
Danny E. Adams  
Jane A. Fisher  
Wiley Rein & Fielding  
1776 K Street, NW  
Washington, DC 20006

**Local Area Telecommunications,  
Inc.**

Andrew D. Lipman  
Catherine Wang  
3000 K Street, NW  
Suite 300  
Washington, DC 20007

**Association for Local  
Telecommunications Services**

John C. Shapleigh  
Suite 1050  
1150 Connecticut Ave., NW  
Washington, DC 20036

**Cellular Telecommunications  
Industry Association**

Michael F. Altschul  
Jack W. Whitley  
1133 21st Street, NW  
Suite 300  
Washington, DC 20036

**McCaw Cellular Communications**

R. Michael Senkowski  
Jeffrey S. Linder  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, DC 20006

**American Personal Communications**

Jonathan D. Blake  
Ellen K. Snyder  
Covington & Burling  
P.O. Box 7566  
Washington, D.C. 20044

**AMSC Subsidiary Corporation**

Bruce D. Jacobs  
Glenn S. Richards  
1255 23rd Street, N.W.  
Suite 800  
Washington, D.C. 20037

**American Public Communications  
Council and North American  
Telecommunications Assoc.**

Albert H. Kramer  
Robert F. Aldrich  
Keck, Mahin & Cate  
1201 New York Avenue, N.W.  
Penthouse Suite  
Washington, D.C. 20005-3919

**U S West**

Jeffrey S. Bork  
1020 19th Street, N.W.  
Suite 700  
Washington, D.C. 20036

**Bell Canada**

H.R. Burrows  
Assoc. Director - Network  
Research Planning & Standards  
Research  
F4, 160 Elgin Street  
Ottawa, Ontario, Canada K1G 3J4

**Paging Network, Inc.**

Intellical, Inc.  
Judith St. Ledger-Roty  
Reed Smith Shaw & McClay  
1200 18th St., N.W.  
Washington, D.C. 20036

**New York Dept. of Public Service**  
William J. Cowan  
Three Empire State Plaza  
Albany, NY 12223

**Illinois Commerce Commission**  
Darrell S. Townsley  
160 North LaSalle Street  
Suite C-800  
Chicago, Illinois 60601

**SNET**  
Linda D. Hershman  
Vice President  
227 Church Street  
New Haven, CT 06510

**Cincinnati Bell**  
Thomas E. Taylor  
Christopher J. Wilson  
Frost & Jacobs  
2500 Central Trust Center  
201 East Fifth Street  
Cincinnati, OH 45202

**Sprint Corporation**  
Jay C. Keithley  
Leon Kestenbaum  
Phyllis Whitten  
1850 M Street, N.W.  
Suite 1100  
Washington, D.C. 20036

**Sprint Corporation**  
W. Richard Morris  
P.O. Box 11315  
Kansas City, MO 64112

**Ad Hoc Telecommunications**  
James S. Blaszk  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Washington, D.C. 20005

**Telco Planning, Inc.**  
D. Kelly Daniels  
808 The Pittock Block  
921 S.W. Washington  
Portland, OR 97205

**Cox Enterprises, Inc.**  
Werner K. Hartenberger  
J. G. Harrington  
Laura H. Phillips  
Dow, Lohnes & Albertson  
1255 23rd St., Suite 500  
Washington, D.C. 20037

**Air Transport Association  
of America**  
James L. Casey  
1301 Pennsylvania Ave., N.W.  
Washington, D.C. 20004

**Aeronautical Radio, Inc.**

John L. Bartlett  
Robert J. Butler  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006

**National Cable Television  
Association, Inc.**

Daniel L. Brenner  
David L. Nicoll  
1724 Massachusetts Ave., N.W.  
Washington, D.C. 20036

**Information Industry Association**

Angela Burnett  
555 New Jersey Avenue, N.W.  
Suite 800  
Washington, D.C. 20001

**Whidbey Telephone Company**

David C. Henny, President  
2747 E. State Highway 525  
Langley, WA 98260-9799

**AMSC Subsidiary Corporation**

Lon C. Levin  
1150 Connecticut Ave., N.W.  
Washington, D.C. 20036